



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

December 21, 2009

Mr. Stephen Quigley
Conestoga-Rovers & Associates
651 Colby Drive
Waterloo, Ontario, Canada
N2V 1C2

RE: Proposed Reduction in Parameters for Groundwater Sampling
South Dayton Dump and Landfill Site, Moraine, Ohio

Dear Mr. Quigley:

The United States Environmental Protection Agency (EPA) has reviewed Conestoga-Rovers & Associates (CRA's) December 16, 2009 proposal to limit groundwater sampling parameters for the December 2009 groundwater sampling event at the South Dayton Dump and Landfill Site to Target Compound List (TCL) volatile organic compounds (VOCs), Target Analyte List (TAL) metals and MNA parameters.

CRA's basis for not analyzing the December 2009 groundwater samples for TCL semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), pesticides and herbicides, is that these compounds have not been detected above Regional Screening Level (RSL) Maximum Contaminant Levels (MCLs) during previous groundwater sampling events.

EPA has reviewed CRA's proposal and cannot approve CRA eliminating analytical parameters from the December 2009 groundwater sampling event as discussed below:

1. Some of the wells being sampled in December 2009 are new wells that have never been sampled (MW-210A, MW-210B, MW-26, MW-27, MW-28, MW-P219, and the existing wells at Dayton Power and Light). These wells should be sampled for all parameters: TCL VOCs, SVOCs, PCBs, pesticides, herbicides and TAL metals.
2. MCLs are not RSL values and should not be used as screening criteria. MCLs are drinking water standards established under the Safe Drinking Water Act.

RSLs are the values in EPA's RSL tables under the headings "Carcinogenic Target Risk (TR) = 1E-06" and "Noncancer Hazard Index (HI) = 1".

3. SVOCs, PCBs and pesticides have been detected above RSLs in one or more groundwater monitoring wells during the 2008-2009 groundwater sampling events (Table 1). Wells installed in 2009 that are being sampled for the second time during the December 2009 sampling event (MW-214, MW-215A, MW-215B, MW-217, MW-218A and MW-218B) should be sampled for TCL VOCs, SVOCs, PCBs, pesticides, and TAL metals. However, EPA agrees these wells do not have to be sampled for herbicides during the December 2009 sampling.

If you have any questions or would like to discuss this further please feel free to contact me via email at cibulskis.karen@epa.gov or at 312-886-1843.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen Cibulskis".

Karen Cibulskis
Remedial Project Manager

TABLE 1**CHEMICALS DETECTED IN GROUNDWATER MONITORING WELLS ABOVE
REGIONAL SCREENING LEVELS (RSLs) 2008-2009****South Dayton Dump and Landfill Site
Moraine, Ohio**

Chemical	RSL (ug/L)	Detected Concentration (ug/L)	Location	Date
SVOCs				
Napthalene	0.14	1.6	Valley Asphalt Well 2	9/2008
		17	MW-215A	7/2009
PCBs				
Aroclor-1242	0.034	0.19	MW-202	7/2009
Aroclor-1254	0.034	0.19	MW-215A	7/2009
Aroclor-1260	0.034	0.16	MW-202	7/2009
		0.19	MW-204	7/2009
Pesticides				
Alpha-BHC	0.01	0.034	MW-215A	7/2009

